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ALL CORRESPONDENCE/PACKAGES TO MONTCLAIR OFFICE PLEASE

LETTER-MOTION, ON CONSENT,  
TO CONTINUE HEARING AND RELATED DATES

July 16, 2021

SERVED AND FILED VIA ECF

Hon. Richard J. Sullivan, U.S.Cir.J. (by designation)  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, N.Y. 10007

Re: *United States v. Edwin Ruiz*, 11-cr-676(RJS)

Dear Judge Sullivan:

This letter-motion is respectfully submitted in response to the order entered on the docket yesterday setting an August 23 hearing date and related earlier deadlines in this VOSR matter. As outlined below, a combination of professional and personal commitments requires me to ask that all dates be continued by approximately 30 days. I have discussed this with AUSA Sarah Kushner, who consents to the application. The parties are available for a hearing in mid- to late September.

On the professional front, I have a jury trial scheduled before Judge Caproni to begin on August 23. The trial is expected to last one week. On the personal side, I had planned to be on vacation from the end of the trial before Judge Caproni through the Labor Day week. I have many personal commitments during that period as our younger daughter is having a “re-celebration” for family and friends of her much smaller pandemic-limited wedding that took place on September 4, 2020. The re-enactment and gathering is set for that same date 2021. The father of the bride has a big role to play. Finally, my wife and I celebrate our 40<sup>th</sup> wedding anniversary on September 5.

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Your Honor's time and attention to this matter are appreciated.

Respectfully yours,  
*/s/ David A. Ruhnke*  
David A. Ruhnke

cc: Sarah Kushner, A.U.S.A. (via ECF)  
US Probation (via email)

Defense counsel's request is granted. IT IS HEREBY ORDERED THAT the VOSR hearing currently scheduled for August 26, 2021 will instead take place on Thursday, September 30, 2021 at 10:00 a.m. at the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007. The government shall file its witness list, exhibit list, and 3500 material by September 22, 2021. In the event that Supervisee intends to call additional witnesses or introduce other exhibits, he shall file a submission by September 27, 2021.

SO ORDERED:

Dated: 7/16/2021

  
RICHARD J. SULLIVAN  
U.S.C.J., Sitting by Designation